

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

In re:

Swain Landing LaPlata JC, LLC

Debtor.

Case No. 25-184-ELG  
(United States Bankruptcy Court  
for the District of Columbia)

Claudia Engelhorn, *et al.*

Plaintiffs,

v.

Erik D. Bolog, *et al.*

Defendants.

Case No. 1:25-ap-00159  
(United States Bankruptcy Court for  
the District of Maryland)

**JOINT STIPULATION REGARDING EXTENSION OF RESPONSE DEADLINE**

Defendants and Counter-Plaintiffs Erik D. Bolog (“Mr. Bolog”), Erik D. Bolog as Trustee of the JAREB Irrevocable Trust, dated October 11, 2021 (“Mr. Bolog as Trustee”), Science Park Associates, LLC (“Science Park”), and Darnestown Road, Inc. (“Darnestown Road,” and collectively with Mr. Bolog, Mr. Bolog as Trustee, and Science Park, the “Bolog Parties”) and Plaintiffs and Counter-Defendants, Claudia Engelhorn (“Ms. Engelhorn”), individually and as Trustee of the Whitewater Revocable Trust dated September 30, 2021, as amended, (“Whitewater Trust”) and White Pearl, LLC (“White Pearl,” and, collectively with Ms. Engelhorn and Whitewater Trust, the “Plaintiffs”), submit this joint stipulation extending the Bolog Parties’ time to file a response to Plaintiffs’ *Motion for Remand and Abstention to the State Court* (ECF No. 43, the “Motion for Remand”).

1. Plaintiffs and the Bolog Parties each agree to extend the Bolog Parties’ deadline to

respond to the Motion for Remand to July 31, 2025.

2. Nothing contained herein shall be construed to prohibit Plaintiffs and the Bolog Parties from requesting or agreeing to additional extensions.

Dated: July 24, 2025

By: /s/ Sam J. Alberts (with consent)  
Sam J. Alberts  
**DENTONS US LLP**  
1900 K St. NW  
Washington, DC 20006  
202-496-7500  
[sam.alberts@dentons.com](mailto:sam.alberts@dentons.com)

-and-

Wes P. Henderson  
Patrick D. Gardiner  
**HENDERSON LAW, LLC**  
2127 Espey Court, Suite 204  
Crofton, Maryland 21114  
410-721-2258  
[wph@hendersonlawllc.com](mailto:wph@hendersonlawllc.com)  
[patrick@hendersonlawllc.com](mailto:patrick@hendersonlawllc.com)

*Attorneys for the Plaintiffs*

Respectfully submitted,

CADWALADER, WICKERSHAM & TAFT LLP



Douglas F. Gansler (Bar Number: 21010)  
Cadwalader, Wickersham & Taft LLP  
1919 Pennsylvania Ave N.W.  
Washington D.C. 20006  
[Douglas.Gansler@cwt.com](mailto:Douglas.Gansler@cwt.com)  
Telephone: (202) 862-2300

By: /s/ Matthew M. Karlan  
Matthew M. Karlan  
(signed by Douglas F. Gansler with  
permission of Matthew M. Karlan)  
Cadwalader, Wickersham & Taft LLP  
200 Liberty Street  
New York, NY 10281  
[Matthew.Karlan@cwt.com](mailto:Matthew.Karlan@cwt.com)  
Telephone: (212) 504-6000

*Counsel for Defendants Erik D. Bolog,  
Individually and as Trustee of the JAREB  
Irrevocable Trust Agreement dated October  
11, 2021; Darnestown Road, Inc.; and  
Science Park Associates, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24th day of July, 2025, a copy of the foregoing was served electronically via CM/ECF upon counsel of record, and remaining parties served via first class mail.

**Counsel of Record Served via CM/ECF:**

Wes P. Henderson (wph@hendersonlawllc.com)  
Patrick Gardiner (patrick@hendersonlawllc.com)

**Henderson Law, LLC**  
2127 Espey Court  
Suite 204  
Crofton, MD 21114

Sam J. Alberts (sam.alberts@dentons.com)  
**Dentons US LLP**  
1900 K St NW  
Washington, DC 20006

Patricia L. Lincoln (p.lincoln@ellis-law.com)  
**Ellis Law Group, P.L.**  
4755 Technology Way  
Suite 205  
Boca Raton, FL 33431

*Counsel for Plaintiffs Claudia Engelhorn; Claudia Engelhorn, Trustee; and White Pearl, LLC*

John J. Connolly (jconnolly@zuckerman.com)  
William J. Murphy (wmurphy@zuckerman.com)  
**Zuckerman Spaeder LLP**  
100 East Pratt Street  
Suite 2440  
Baltimore, MD 21202

*Counsel for Defendant Whiteford, Taylor & Preston, LLP*

Maurice Belmont VerStandig (mac@mbvesq.com)  
**The VerStandig Law Firm, LLC**  
9812 Falls Road #114-160  
Potomac, MD 20854

*Counsel for Defendant Swain Landing LaPlata JC, LLC*

**Parties Served Via First Class Mail:**

**Tenacity Investments, LLC**

S/O: Mike Postal  
7333 New Hampshire Avenue  
Takoma Park, MD 20912

**Michael Postal**

4302 Broken Arrow Court  
Apt. 606  
Clinton, MD 20735

**POJO LaPlata LLC**

S/O: Anjon Jones  
4302 Broken Arrow Court  
Clinton, MD 20735

Respectfully,



Douglas F. Gansler (Bar Number: 21010)  
Cadwalader, Wickersham & Taft LLP  
1919 Pennsylvania Ave N.W.  
Washington D.C. 20006  
Douglas.Gansler@cwt.com  
Telephone: (202) 862-2300

*Counsel for Defendants Erik D. Bolog, Individually  
and as Trustee of the JAREB Irrevocable Trust  
Agreement dated October 11, 2021; Darnestown  
Road, Inc.; and Science Park Associates, LLC*